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**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

**VOLTSTAR TECHNOLOGIES,  
INC.,**

**PLAINTIFF,**

**v.**

**GC TECHNOLOGY, LLC DBA  
PHONESUIT,**

**DEFENDANT.**

**CASE NO. 2:25-CV-01036-AJR**

**SECOND STIPULATION TO  
EXTEND TIME TO RESPOND TO  
INITIAL COMPLAINT**

**Complaint served: February 25, 2025  
Current response date: April 17, 2025  
New response date: May 19, 2025**

**Courtroom: 780  
Judge: Hon. A. Joel Richlin**

Pursuant to Local Rule 8-3, Plaintiff Voltstar Technologies, Inc. (“Plaintiff”) and Defendant GC Technology, LLC dba Phonesuit (“Defendant”), by and through their respective counsel, hereby stipulate and agree as follows:

1 1. WHEREAS, Plaintiff filed its Complaint on February 6, 2025 (Dkt. 1);

2 2. WHEREAS, Plaintiff served its Complaint on February 25, 2025;

3 3. WHEREAS, Defendant is required to answer or otherwise respond to  
4 the Complaint by April 17, 2025;

5 4. WHEREAS, Defendant recently retained Fish & Richardson P.C. as  
6 counsel in this matter;

7 5. WHEREAS, counsel for the parties have jointly agreed, subject to the  
8 approval of the Court, to an additional 30-day extension for Defendant to answer or  
9 otherwise respond to the Complaint;

10 6. WHEREAS, the parties believe that good cause exists for this extension  
11 for a number of reasons, including to permit counsel for Defendant sufficient time  
12 to investigate the allegations set forth in Plaintiff's Complaint, consult with their  
13 client, and consider an appropriate response;

14 7. WHEREAS, no party will be prejudiced by the relief sought;

15 8. WHEREAS, trial will not be delayed because the Court has not set a  
16 trial date, and this brief extension will not impact other deadlines in this case; and

17 9. WHEREAS, the present extension is not sought for any improper  
18 purpose.

19  
20 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED BY THE  
21 PARTIES that the time for Defendant to answer or otherwise plead to the Complaint  
22 in the above-captioned action shall be, and hereby is, extended by 30 days to May  
23 19, 2025.

1 Dated: April 16, 2025

SRIPLAW, P.A.

2 /s/ Matthew L. Rollin with permission

3 Matthew L. Rollin (SBN 332631)

4 SRIPLAW, P.A.

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10 COUNSEL FOR PLAINTIFF

11 VOLTSTAR TECHNOLOGIES, INC.

12 Dated: April 16, 2025

FISH & RICHARDSON P.C.

13 /s/ Rodeen Talebi

14 Rodeen Talebi (SBN 320392)

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19 COUNSEL FOR DEFENDANT

20 GC TECHNOLOGY, LLC DBA

21 PHONESUIT